

**U S WEST Communications, Inc.
Regional Policy and Procedures**

**RPP T005 - CUSTOMER PROPRIETARY NETWORK INFORMATION
Table of Contents**

	Paragraph
Section 1. Company Policy	
Overview	1.01
What is CPNI?	1.02
Customer-Specific CPNI	
Aggregated CPNI	
FCC Requirements/U S WEST's Commitments	1.03
State PUC Requirements (In Addition to the FCC's)	1.04
Table 1 - CPNI Types and Uses	Appendix A
Section 2. Notification of CPNI Options	
Overview	2.01
Notification Development	2.02
Options for Delivery of the Notification	2.03
Delivery Procedures	2.04
Customer Responses	2.05
1994 CPNI Notification	Appendix A
Section 3. Customer Options and Authorizations	
Customer Options	3.01
Methods of Authorization	3.02
Processing Customer Authorizations	3.03
Customer Service Record CPNI Indicator	
Letter of Agency (LOA)	Appendix A
Exclusive Letter of Agency (ELOA)	Appendix B
Blanket Authorization Agreement (BAA)	Appendix C
CPNI Release/Authorization Guidelines Table	Appendix D

**U S WEST Communications, Inc.
Regional Policy and Procedures**

RPP T005 - CUSTOMER PROPRIETARY NETWORK INFORMATION

Section 1. Policy

1.01 OVERVIEW

Several FCC orders enable U S WEST Communications to sell customer premises equipment (CPE) and enhanced services (such as voice messaging service) without forming separate subsidiaries. Enhanced services are services in which computer processing changes or modifies the data or information passed over the network, or allows interaction with stored information. Customer premises equipment (CPE) is telecommunications hardware located on the customer premises, such as telephone sets, PBX's and modems.

There are a number of regulatory requirements U S WEST must follow to sell these FCC unregulated products on an integrated, or "joint marketing" basis. Every employee involved in the planning, marketing, or sale of enhanced services or CPE must understand the regulatory requirements. They include:

- public disclosure of new or changed network interfaces,
- no preferential treatment to our CPE or enhanced/information services operations over competitors with similar services,
- protection of customer record information (CPNI),
- no subsidization of the unregulated product activity by the revenues from our regulated services, and
- development of network features/functions requested by competitor enhanced services providers (these services are referred to as "ONA services").

This document presents the regulatory requirements, and the company guidelines for protection of customer record information (CPNI). Customer record information (CPNI) used for enhanced services or CPE planning, marketing, or sales may be obtained from U S WEST Communications database systems under the guidelines contained in this document. A glossary is included to explain some frequently used terminology in this document.

1.02 WHAT IS CPNI?

Customer Proprietary Network Information - CPNI - is information collected by U S WEST in connection with providing network services (Common Carrier Services) to a given customer. There are two types of CPNI: customer-specific and aggregated.

Aggregated CPNI

Aggregated CPNI is a collection of customer-specific CPNI which is combined so that individual customers cannot be identified. Aggregated CPNI is a combination of all customers in a specific class or category, or subscribing to a particular service or feature, regardless of unlisted, non-published or CPNI restriction status. The currently available (non-proprietary/"approved") aggregated CPNI are (by central office):

- number of lines by business/residence
- number of lines with Touch Tone (Touch Tone penetration)
- average number of messages (number of calls - 1985 data)
- average minutes of use (1985 data)
- average call duration (1985 data)

Examples of potential aggregated CPNI (but are not currently approved or available to any enhanced service provider or CPE vendor) include: the number of our residential customers, and product penetration data, such as # of call waiting subscribers/units sold.

Examples of information that looks like aggregated CPNI but instead is USW proprietary information includes number of service orders, forecasts, and Central Office traffic loads.

Any aggregated CPNI used for planning, marketing, or selling of enhanced services or CPE must be available on equal terms and conditions (including at the same time) to non-U S WEST enhanced service or CPE providers. This means we must make public notice of the availability of such new aggregated CPNI, so other enhanced service providers/CPE vendors are aware of the availability of the information to them at the same time U S WEST Communications develops and uses it. New aggregated CPNI will be announced via the U S WEST ONA Newsletter.

Requests for new aggregated CPNI, from USW employees or non-U S WEST vendors, should be processed through the Vendor Service Center, and forwarded to the Corporate CPNI Compliance Manager for review and approval prior to development or use by enhanced services/CPE employees. New aggregated CPNI, when approved, must be available to U S WEST and non-U S WEST enhanced services or CPE providers at the same time.

NOTE

U S WEST makes use of many types of aggregated CPNI in conducting its regulated business. These rules only apply to use of aggregated CPNI by our enhanced services/CPE employees.

Table 1 in Section 1, Appendix A is a summary of the CPNI definitions.

Customers with 21+ lines will be CPNI restricted until we receive the customer's written authorization to allow our employees that plan, market, or sell enhanced services to access and use their CPNI. All new connect orders placed for 21+ lines will be CPNI restricted from our enhanced services employees. An annual mechanized true-up process will restrict customers that have grown to 21+ lines and add the customer's chosen CPNI status to existing 21+ lines multi-location customers who have added new sites. (SEE SECTIONS 3, 4, 5)

Enhanced services/CPE employees are mechanically denied access to CPNI restricted accounts in the primary marketing databases. Business unit methods and procedures direct CPNI protection for auxiliary, unsecured systems occasionally used by marketing employees. (SEE SECTION 4)

4. FCC Restrict enhanced services employees from accessing the Call Forwarded-To telephone number on pre-programmed call forwarding features. The Call Forwarded-To number may designate an end user's enhanced service provider.
- USW U S WEST uses mechanized blocking of the pre-programmed Call Forwarding service's Call Forwarded-to Number ("CFN"). In addition, enhanced services employees are advised that they may not use customer CPNI that identifies the competitive enhanced service providers customers subscribe to for the purpose of selling our enhanced service to those customers. (SEE SECTION 4)
- WHY The FCC requirement prevents our enhanced services employees from identifying subscribers of external Enhanced Service Providers service to unhook these customers and sell our enhanced services products instead.
5. FCC Aggregated CPNI used for U S WEST enhanced services or CPE planning, marketing, or sales purposes must be available to external CPE vendors and enhanced services providers under equal terms and conditions.
- USW Existing, publicly available aggregated CPNI is available to affiliated and non-affiliated enhanced services and CPE providers via the Vendor Service Center and the ICONN database; new requests for aggregated CPNI from U S WEST and non-U S WEST entities should be submitted via the Vendor Service Center. (SEE SECTION 5)
- WHY To ensure fairness in the market place we must make the same aggregated customer information used by our enhanced service/CPE operations available to external enhanced service providers and CPE vendors.
6. FCC Provide customer-specific CPNI to customer authorized enhanced services or CPE vendors without charge unless the ability to provide the information imposes a burden on U S WEST. Any charges for delivery of customer specific CPNI will also impose a like obligation on U S WEST enhanced services/CPE requests for such information.

1.04 STATE PUC REQUIREMENTS (IN ADDITION TO THE FCC'S)

1. OREGON USWC may not create a list of Oregon customers based on CPNI for enhanced services direct mail or telemarketing purposes without first receiving written consent from the customer to use their CPNI for that purpose.

USWC Internal methods direct employees on this restriction.
2. OREGON Both residential and business customers with 21+ lines must receive the annual CPNI notification of their options regarding their telephone service record.

USW Oregon residential customers with 21+ lines will receive annual CPNI notification. (Business customers already receive annual notification, per FCC rules.)
3. OREGON USWC must issue a CPNI notification to "new connect" customers with 21+ lines, within 30 days of placing their order for service.

COLORADO USWC must issue a CPNI notification to "new connect" business customers with 21+ lines within 60 days of placing their order for new service.

USW "New connect" customers with 21+ lines will receive a CPNI notification within 30 days of placing their order for new service.
4. OREGON & COLORADO USWC must place a CPNI notification, comparable to the one sent annually to customers with 21+ lines, in local telephone directories.

USW A comparable statement of customer CPNI options will appear in the Consumer Tips section of our local directories.
5. OREGON & COLORADO USW affiliates of U S WEST Communications are considered "third parties." As such they may not access USWC customer-specific CPNI without USWC receipt of customer authorization to release it to third parties or to them specifically.

USW USWC will not release customer record information to other U S WEST companies without customer authorization to release their information to third parties, or specifically, a USW entity.
6. COLORADO CPNI includes billing name and address.

USW Company procedures direct protection of Colorado customer billing name and address as we protect other CPNI.

TABLE 1
CPNI – TYPES & USES (Page 1 of 2)

DEFINITION	ACCESS & USE
<p><u>Customer-Specific CPNI</u> - U S WEST information about the basic network services the customer buys from U S WEST:</p> <ul style="list-style-type: none"> - the type of network services - quantity of network services - location of network services - billing information - repair information - traffic studies - usage data - customer calling patterns <p>This information can be found in Customer Service Records (CSR's), repair records, service orders, and customer contracts.</p> <p><u>Non-CPNI Data:</u></p> <ul style="list-style-type: none"> • Name* • address* • telephone number • credit information • information about USW enhanced services, CPE, or inside wire • Standard Industry Code (SIC) • Master Customer Number (MCN) • Market Segmentation <p>Information such as U S WEST Communications network planning information product costing, and forecasts is not CPNI.</p> <p align="center">NOTE</p> <p>* Colorado State Commission's ONA order defines <i>billing</i> name & address as CPNI.</p>	<p>U S WEST employees involved with enhanced services or CPE planning, marketing, or sales may only access and use the customer record information from <u>unrestricted</u> customer accounts.</p> <p>This information may be accessed in password/ID secured databases, via market unit CPNI Coordinators, or from unsecured systems through systems administrators.</p> <p align="center">NOTE</p> <p>If a customer gives his/her network information to an employee they know markets enhanced service/CPE, that information is not treated as CPNI.</p> <p>If a customer doesn't know the employee markets enhanced services/CPE, or knows they are "network only" employees, the data must be treated as CPNI.</p>

**U S WEST Communications, Inc.
Regional Policy and Procedures**

RPP 1005 - CUSTOMER PROPRIETARY NETWORK INFORMATION

Section 2. Notification of CPNI Options

2.01 OVERVIEW

The FCC requires U S WEST to provide multi-line business customers written annual notification of the rights/options those customers have regarding the handling of the network information (CPNI) in their telephone accounts. U S WEST sends an annual notification to all its business customers.

Usually the annual notification is sent as a bill insert. Distribution of the annual notification as a bill insert is a mechanized process, requiring planning time of 9 -12 months. The notification process is managed by the Corporate CPNI Compliance Manager with market unit input to the notification's content and delivery process.

2.02 NOTIFICATION DEVELOPMENT

The annual notification must contain certain information, to satisfy FCC requirements and fully inform customers of their options. We must tell our business customers:

- that the FCC allows joint marketing of enhanced services and CPE;
- what are enhanced services and CPE;
- it's an annual requirement to inform business customers about their CPNI options;
- there are other providers of enhanced services and CPE, in addition to U S WEST;
- all the customer options for CPNI treatment;
- they may exercise and change their options at any time;
- their choice remains unchanged until they submit a new choice;
- we provide a response form.

In addition, it is important to explain for multi-location customers with more than 21 lines about the "prior authorization" mandate in the FCC's 1991 order. We can advise about U S WEST's annual process that 1) matches new sites belonging to multi-location customers with a total of 21 + lines to the choice they submitted for the pre-existing sites or left restricted by FCC mandate; 2) applies FCC required restriction to accounts that have recently grown to exceed the 21 + line count, unless the customer takes affirmative action to be unrestricted. (We call this a true-up process.)

Any significant change in U S WEST's CPNI notification requires FCC review and approval prior to release. Allow at least 90 days to obtain FCC review and approval of a changed notification. A copy of the 1994 CPNI notification is in Section 2, Appendix A.

1994 CPNI Notification

Dear Business Customer:

Each year, the Federal Communications Commission (FCC) requires U S WEST to inform you about the records we keep regarding the U S WEST telecommunications services you use. This information is called Customer Proprietary Network Information (CPNI) by the FCC and state regulatory commissions.

The information is contained in your telephone account record at U S WEST, and includes: the type and quality of U S WEST network services you use (such as local telephone lines, custom calling features like Call Waiting and Call Forwarding), their usage, and related billing data.

CPNI, as defined by these regulatory agencies, **does not include** information about customer-owned telephone equipment or enhanced services purchased from U S WEST or your business's personal information, such as payment history, credit rating, or any information about your company's personnel.

Your Options

The information about the network services you currently use may be helpful in designing telecommunications solutions for your business needs. Our telecommunications solutions may include U S WEST's enhanced services, such as our Business Voice MessagingSM Service, Never-Busy FaxSM Service, or customer owned communications equipment, such as telephone sets, PBXs or modems. You determine whether U S WEST employees who market enhanced services or customer-owned communications equipment along with our network services may refer to the network service information in your account to consult with you.

Enhanced services and customer-owned communications equipment are also offered by other companies. You may choose to have us provide your telephone account information to those companies. We do not provide your telephone account information to these other companies unless you tell us in writing to do so.

The attached response form explains all the options available to you regarding the use of the network service information (CPNI) in your telephone account record. You may return this response form or send a letter expressing your choice at any time. The choice made by your company in the past or through this response form, will be honored until you change it.

If your business has up to twenty local lines, our marketing employees may access your network service information to consult with you about our enhanced services and communications equipment, unless you direct us to restrict them from your account.

If your business has more than twenty local lines, our employees who market communications equipment may access your network service information to consult with you about our communications equipment products, unless you direct us to restrict them from your account. *However, the FCC requires that we must receive your written permission to access your network service information and refer to it when consulting with you about our enhanced services.*

If you do not respond to this notice, your firm's most recent response will remain in effect. **If you have more than twenty lines and did not respond to the previous year's notices, our employees who market enhanced services will be restricted from your account, as required by the FCC.** This means they cannot refer to your existing network services to consult with you about enhanced services and their application to your business. You must send written permission to remove this restriction from your account.

Annual Customer Account Information Notice Response Form

May U S WEST employees who market enhanced services or communications equipment refer to your network service information?

Your options allow you to choose which U S WEST employees may refer to your telephone account information.

Enhanced Services

☐ **Yes**, U S WEST employees who market enhanced services may refer to my telephone account information to design telecommunications solutions for my business.

☐ **No**, U S WEST employees who market enhanced services may not refer to my telephone account information to design telecommunications solutions for my business.

I do not want the following specified network service information shared with U S WEST employees who market enhanced services.

I want my network service information restricted from U S WEST employees who market enhanced services, for a short period of time (dates noted here):

Communications Equipment

☐ **Yes**, U S WEST employees who market customer owned communications equipment may refer to my telephone account information to design telecommunications solutions for my business.

☐ **No**, U S WEST employees who market communications equipment may not refer to my telephone account information to design telecommunications solutions for my business.

I do not want the following specified network service information shared with U S WEST employees who market communications equipment.

I want my network service information restricted from U S WEST employees who market communications equipment, for a short period of time (dates noted here):

U S WEST Communications, Inc. Regional Policy and Procedures

Section 3. Customer Options & Authorizations

3.01 CUSTOMER OPTIONS

Customers have the right to control who may access and use the network service information in their telephone account. This right impacts our procedures for marketing of enhanced services or CPE. The customer can tell U S WEST to:

- Release the network service information to any non-affiliated enhanced service or CPE vendor who requests their CPNI;
- Release the network service information to only designated non-affiliated enhanced service or CPE vendors, upon their request;
- Restrict the network service information from U S WEST employees who plan, market, or sell either enhanced services or CPE, or both;
- Remove the FCC's mandated restriction on the customer's account (those with 21 + lines) so U S WEST enhanced services employees who plan, market and sell enhanced services may access the information;
- Change a previous status to another;
- Restrict only part of the CPNI; or
- Restrict or release the CPNI for a designated period of time.

3.02 METHODS OF AUTHORIZATION

Customers may authorize restriction or release of the network service information in their telephone account via:

- Annual CPNI notification response form

The response form allows customers to designate their choice from all the options possible. The 1994 CPNI notification and response form is in Section 2, Appendix A.

- Personal letter to U S WEST Communications

A customer may send in a personal letter at any time requesting their account be restricted, unrestricted, or change the status of their account.

- A form created by a market unit sales channel

Some market units may develop an abbreviated form to handle day-to-day CPNI restriction questions/changes. (Note that this form does not satisfy the FCC's annual notification requirement). When the market unit forms are received, they must be sent to the VSC for official change in the CPNI status of the customer record, as well as for retention in the official files.

- Personal letter to their vendor

3.03 PROCESSING CUSTOMER AUTHORIZATIONS

The Vendor Service Center (VSC) manages the order writing activity to apply the appropriate CPNI status to a customer's record, based on the authorization sent to U S WEST. The table entitled *CPNI Release/Authorization Guidelines* in Section 3, Appendix D presents the system entry to apply to the customer service record based on the type of authorization and choice made by the customer.

The Vendor Service Center also serves as the central repository for all customer CPNI response forms, personal letters, and vendor Blanket Authorization Agreements. Any such documentation received by sales and service channels must be forwarded to the VSC for official file retention. These files are the only paper record of customer authorizations, and are audited periodically.

Customer Service Record CPNI Indicator

The customer's CPNI option is recorded in the Proprietary Classification field identifier (PCL FID) floated in the identification section of the customer service record, in our legacy systems. Following are the PCL FID assignments for the respective customer choice.

<u>If a customer responds with written authorization and chooses to...</u>	<u>and the customer has 1-20 lines</u>	<u>and the customer has 21+ lines</u>
Restrict CPNI from both USW CPE and enhanced services marketing employees	ALL	ALL
Restrict CPNI from only USW CPE marketing, unrestrict from enhanced services employees	21C	21C
Restrict CPNI from only USW CPE employees, no response for enhanced services	CPE	ALL *
Restrict CPNI from only USW enhanced services employees, unrestrict for CPE	ONA	ONA
Unrestrict from USW CPE employees, unrestrict from enhanced services employees	NON	NON
Unrestrict from USW CPE employees, no response for enhanced services	blank	ONA *
Restrict from USW enhanced services employees, no response for CPE	ONA	ONA
No response for CPE, no response for enhanced services	blank	ONA *
Have a portion of the account partially restricted or released (depends upon which section of the notification they indicate the choice of partial restriction)	ONA, CPE, ALL, or 21C	ONA, CPE, ALL, or 21C

* Customers will become restricted annually via a spin/scrub

Letter of Agency (LOA)

**MICROSI, INC.
10028 S. 51 Street
Phoenix, AZ 85044
(602) 893-8898**

LETTER OF AGENCY

U S WEST
202 E. Earll Drive
Room 250
Phoenix, AZ 85012

TO WHOM IT MAY CONCERN:

We have retained Inter-Tel Net Solutions, 6505 W. Chandler Boulevard, Chandler, AZ 85226, as our authorized agent to interface with your company(ies) regarding all aspects of their telecommunications and services.

Under the terms of this agreement and by this letter, we do hereby authorize Inter-Tel Net Solutions to handle all negotiations for service requests and the issuance of orders. This authorizes Inter-Tel Net Solutions to obtain information on our account in order to process requests. The agency authorization shall continue in effect until you are notified of its cancellation in writing.

This authorization shall in no way preclude our ability to act on our own behalf when we deem it necessary.

Upon their request, please send any correspondence to:

Inter-Tel Net Solutions
6505 W. Chandler Boulevard
Chandler, AZ 85226

Exclusive Letter of Agency (ELOA)

The Circle K Corporation
CONVENIENCE FOOD STORES

April 6, 1987

To Whom It May Concern:

Effective as of the date of this letter, Telecommunications Management Associates, Inc. is authorized to act as our exclusive agent in ordering all telecommunications equipment and services for our company either verbally or in writing. This includes obtaining service records and/or billing records. This letter rescinds all other letters of agency previously entered into by the Circle K Corporation.

This agreement shall remain in effect until terminating in writing either by our firm or by Telecommunication Management Associates, Inc.

Sincerely,

Harry Heintz
Manager, Communications Services

cc: Mike Bresheares
Jim Wesseling

Blanket Authorization Agreement (BAA)

BLANKET AUTHORIZATION FORM

This Agreement sets forth the conditions by which a Vendor may request information from U S WEST Communications ("USWC") on behalf of a Customer.

For the purpose of this Agreement, the party requesting information shall be referred to as the "Vendor."

For the purpose of this Agreement, the party for whom the Vendor requests information shall be referred to as the "Customer."

By signing this Agreement, the Vendor represents and warrants that it is authorized to request information for or on behalf of the Customer.

With respect to requests for Customer Proprietary Network Information (CPNI) regarding the Customer's telecommunications services, the Vendor agrees as follows:

1. To request a Customer's Proprietary Network Information (CPNI) only if Vendor has a current written authorization from Customer authorizing such requests in the Vendor's files and USWC may rely on Vendor's representation that it has such authorization in its files.
2. To retain all written authorizations in its files for as long as Vendor represents the Customer and makes requests for information on behalf of Customer.
3. To allow USWC to audit Vendor's files periodically or on demand to verify that Vendor's obligations under this Agreement are met.
4. To indemnify USWC from any and all damages and losses and expenses resulting from USWC's reliance upon Vendor's representation regarding requests for Customer CPNI.

This Agreement shall commence on the date noted below and shall continue in effect unless terminated by either party by providing five (5) days written notice to the other.

The termination of this Agreement shall not affect the rights of the parties for actions prior to the date of termination.

Dated this _____ day of _____ 19 _____

Vendor Company _____

Name _____

Title _____

CPNI RELEASE/AUTHORIZATION GUIDELINES

CUSTOMER CPNI OPTION(S)	CUSTOMER AUTHORIZATION OVERRULE BCA ⁽²⁾	U S WEST RESPONSIBILITY	REQUIRED SYSTEM ENTRY
I. RELEASE CPNI TO DESIGNATED AGENTS/VENDORS ⁽²⁾ (BAA)	<ul style="list-style-type: none"> Exclusive letter of agency* 	<ul style="list-style-type: none"> Release only to exclusive agent/vendor upon request 	<ul style="list-style-type: none"> PERMANENT NOTE on CSR 'LOA (NAME)'
	<ul style="list-style-type: none"> Customer letter of annual CPNI response form - designating release to specific agents/vendors only 	<ul style="list-style-type: none"> Release <u>only</u> to designated agents/vendor upon request Do not release to other agents/vendors 	<ul style="list-style-type: none"> PERMANENT NOTE on CSR 'LOA (NAME)'
II. RELEASE CPNI TO AGENTS/VENDORS WITH APPROPRIATE ⁽²⁾ AUTHORIZATION	<ul style="list-style-type: none"> Same as I. above 	<ul style="list-style-type: none"> Same as I. above 	<ul style="list-style-type: none"> Same as I. above
	<ul style="list-style-type: none"> CPNI response form designating release to any vendor/agent* Letter of agency (LOA)* or Blanket Authorization Agreement (BAA) - with verbal attestation that agent/vendor has appropriate written authorization from customer 	<ul style="list-style-type: none"> Release to agents/vendors with LOA or BAA upon request 	<ul style="list-style-type: none"> PERMANENT NOTE on CSR 'LOA (NAME)' OR 'BAA (NAME)'
III. RESTRICT FROM U S WEST ENHANCED SERVICES/CPE EMPLOYEES ⁽²⁾	<ul style="list-style-type: none"> Annual 'true up' process based on 1991 FCC order restricting access by USW enhanced services employees from customers' records with 21 + lines Customers with 1-20 lines Customer letter or CPNI notification response form, designating restriction from USW ES or CPE personnel Customers with 21 + lines no response to annual notification 	<ul style="list-style-type: none"> Restrict CPNI of customers from USW ES or CPE employees, as requested Restrict USW ES employees until have a written authorization from customer to unrestrict account(s) Do not release to any non-affiliated agents/vendors 	<ul style="list-style-type: none"> PCL, fid 'EXNA' or 'ALL' PCL, fid 'ONA' or 'ALL' or 'CPE' as appropriate
IV. RELEASE CPNI TO U S WEST ENHANCED SERVICES/CPE EMPLOYEES ⁽²⁾	<ul style="list-style-type: none"> Customers with 1-20 lines a) No response to annual notification, or b) Letter/response form designating release to USW ES/CPE employees 	<ul style="list-style-type: none"> Release CPNI of customers with 1-20 lines to <u>only</u> USW ES or CPE employees, as requested per customer letter/response form Do not release to any non-affiliated agents/vendors (unless one of the release options is also chosen by the customer) 	<ul style="list-style-type: none"> a) PCL, fid 'leave R BLANK' b) PCL, fid 'ONA' or 'ALL' or 'CPE' as appropriate
	<ul style="list-style-type: none"> Customers with 21 + lines a) Positive response to annual notification, or letter requesting restriction from USW ES or CPE personnel b) No response to annual CPNI notification 	<ul style="list-style-type: none"> Release CPNI of customers with 21 + lines to USW ES employees Do not release to any non-affiliated agents/vendors unless release option also chosen Release CPNI of customers with 21 + lines to <u>only</u> USW ES employees, if not previously restricted Do not release to any non-affiliated agents/vendors 	<ul style="list-style-type: none"> a) PCL, fid 'NONE' b) PCL, fid 'ONA' or 'ALL'

- (1) Must be in writing, and any conflicts must be reconciled with customer.
 (2) Entry of PCL fid is required to id 'restrict' record and to enact system password/id security on USW service order systems.
 (3) Customer letter, request for proposal, public bid, etc. is sufficient customer authorization to release CPNI. Furthermore, USW VSC or ICSC has responsibility to conduct periodic on demand audit of agents/vendors using BAA to ensure compliance that they have appropriate customer authorization on file.
- Subsequent customer letter of authorization to release record information to agents overrides any LOA or ELOA on file.

U S WEST Communications, Inc.
Regional Policy and Procedures

RPP T005 - CUSTOMER PROPRIETARY NETWORK INFORMATION

Section 4. Security Measures

4.01 OVERVIEW

Employees who market, plan, or sell enhanced services or CPE products, may not access CPNI-restricted customer accounts. Nor may they use information from restricted accounts to promote or market these unregulated products/services. System/database security is designed to allow access based on employee responsibility, and to deny access to protect CPNI-restricted information.

4.02 ACCESS / USE BASED ON EMPLOYEE RESPONSIBILITY

U S WEST employees may only access and use customer record information (CPNI) they are authorized to use. That authorization is based on their role/responsibility.

"Network only" employees

"Network only" employees are those who do not market, plan, or sell CPE or enhanced services and therefore may access any customer record. However, they must protect customer record information and ensure it is released to U S WEST employees or non-affiliated entities only under the proper conditions and procedures. Examples of "network only" employees are:

- sales personnel who do not sell or initiate the sale of enhanced services or CPE (e.g., service representative, service specialist, order writers);
- CPNI Coordinators;
- product developers/managers of regulated services;
- Vendor Service Center employees;
- marketing employees with no involvement in development, planning or marketing of enhanced services/CPE products.
- applications managers for regulated services;
- market managers who handle only basic, regulated service projects/analysis.
- Maintenance administrators/technicians who do not sell enhanced services or CPE.

"Enhanced services / CPE" employees

"Enhanced services/CPE" employees are those who market, plan, or sell the enhanced services or CPE U S WEST chooses to develop and market. These employees are restricted, at all times, from CPNI-restricted customer records, and from blocked Call Forwarded-To telephone numbers ("CFN's") on the customer record even when not CPNI-restricted. Examples of such employees are:

Job/Position**How CPNI Rules Apply (cont.)**

Market Managers

Product Developers

If a market manager/product developer works on both regulated and unregulated products, s/he may only access and use unrestricted USWC customer account information for all projects. (Their time and the use of the CPNI for the unregulated products must be accounted for under Part X accounting methodology.)

Project Managers

Product Managers

Legal counsel has advised that project/product management of enhanced/information services or CPE should be a separate responsibility from management of basic network services.

There exists the concern or perception that joint management of basic and unregulated services will influence decisions about the basic services, which may disadvantage competitors. Individuals involved in marketing of both regulated and unregulated products will be prohibited from access to restricted CPNI at all times. (This restriction also applies to market managers, as noted above.)

CPNI Coordinator

A CPNI Coordinator is a business unit CPNI subject matter expert and point of contact to request CPNI from unsecured databases. The CPNI Coordinator is an internal consultant to assist with data needs. S/he is responsible to ensure:

- against passage of restricted customer information to "enhanced services/CPE" employees;
- data/reports from unsecured systems are conducted via the appropriate systems managers;
- lists provided to "enhanced services/CPE" employees are stripped of CPNI-restricted customers; and also ensure such lists exclude unlisted and non-published customers when lists are for telemarketing purposes;
- "enhanced services" employees do not access or use CPNI that identifies existing customers of competitor enhanced service providers, for the purpose of targeting USW enhanced services marketing activities. For example, the Call Forwarded-to Number is stripped from any report requested by "enhanced services/CPE" employees;

The Methods direct that before an "enhanced services/CPE" marketing employee accesses the unsecured system for a customer record, the employee must first check the account's CPNI status in a password/ID secured system. If the account is CPNI-restricted, the customer/issue must be handed off to a "network only" employee. If the customer is not CPNI-restricted, the enhanced service/CPE employee may proceed to pull the account information from the unsecured system.

When the primary system(s) goes down, and the sales office must rely on a back-up system, for example, LMOS, you may only discuss enhanced services or CPE if the customer initiates the discussion. You may give general information, rates, and answer questions. You may not close an enhanced services sale and place an order for the service until you can access the account in a secured system. Once the secured system has been restored, you may initiate the sale of enhanced services and CPE.

Denial of Access

Systems such as RMIE and CRIS are not password/ID secured, nor are they directly accessible by individuals other than the RMIE or CRIS systems managers. Any data requests for RMIE or CRIS based customer information must be requested from the business unit CPNI Coordinator or the RMIE or CRIS systems managers. The systems managers will screen each request, to ensure the individual receives the customer information s/he is authorized to access and use.

Reports produced from these systems must be stamped to inform users of the data used to create the report. More information about specific types of reports and appropriate stamps required on all such lists and reports is in Section 5, *Access & Use Guidelines*.

New Systems

As new systems are developed and come on-line, CPNI protection must be addressed. Consultation with business unit CPNI Compliance Methods Manager, Business Unit ONA Compliance Manager, and the Corporate CPNI Compliance Manager should occur early in system development and implementation activities.

Call Forwarded-To Numbers ("CFN")

The FCC mandated that preprogrammed call forwarded-to numbers (CFN's) that appear on a customer service record be blocked from U S WEST enhanced services' marketing employees. This includes the CFN associated with Market Expansion Lines (MEL) and ISDN call forwarding features. This blocking is to prevent identification of the customer's enhanced service provider, and any attempt to unhook the customer from the other provider.

U S WEST satisfies this requirement through mechanized blocking of the telephone number on the customer service record. Specifically, it looks like:

EVF/TN 345-1234/CFN ***-****

All enhanced services service representatives are blocked from this data on all customer records. There are exceptions to this blocking arrangement when enhanced services employees can have access to the blocked CFN number:

- if the feature is used to forward calls to U S WEST's voice messaging service (or any other U S WEST enhanced service), the call forwarded-to number may be noted in the service record on a Permanent Remarks line.
- if the feature is used to forward calls to a residential number, additional information may be provided on the line to show the number to which the calls will forward.
- if the feature is used to forward calls to the customer's other business telephone number at the same or a different location. The above two applications will look like:

EVF/TN 345-1234/CFN ***-****/DES CF TO NNX-XXXX

- if the call forwarding service is used in lieu of internal hunting. Internal hunting is defined as hunting if the line is busy for the same customer on the same account. Additional information may be provided on the line to show the number to which the calls will forward. It will look like:

EVO/TN 345-1234/CFN ***-****/DES HTG TO NNX-XXXX

Business unit methods & procedures also direct that enhanced services employees may not access blocked CFN's in unsecured systems.

Non-U S WEST Entities

- Vendors and agents may request customer specific CPNI via the Vendor Service Center or customer sales centers. Aggregated CPNI must be requested via the Vendor Service Center.
- Customer specific data will be released based on customer authorization, Letter of Authorization and/or Blanket Authorization Agreement on file with U S WEST. (See Section 3)
- U S WEST will provide the authorized customer-specific CPNI and the approved aggregated CPNI at no charge, unless providing the information proves burdensome to U S WEST. If we do charge, we must charge our own affiliated and integrated enhanced services/CPE operations the same amount for the same data.

U S WEST Communications

CPNI Coordinators

<u>MU/SU</u>	<u>NAME</u>	<u>ADDRESS</u>	<u>TELEPHONE/FAX</u>
ACS	Liz Jensen	150 S. 5th Street, Room 3200 Minneapolis, MN 55402	(612) 663-3167 663-3552
BGS	Paul Millen	1314 DOTM, 6th Floor Omaha, NE 68102	(402) 422-7599 422-8228
IXC	Beth Johns	7980 SW Barnes Rd. Portland, OR 97204	(503) 242-7698 242-4577
Finance	Dick Gutierrez	1801 California, Room 2630 Denver, CO 80202	(303) 896-0199 896-6886
ITS	Jerry Mayer	1801 California, Room 2540 Denver, CO 80202	(303) 896-4755 896-8737
Multimedia (MCG)	Lynette Hately	9785 Maroon Circle, Suite 400 Englewood, CO 80112	(303) 754-5443 754-4315
N&TS	Anne Richardson	300 W 66th, 1st Floor Richfield, MN 55423	(612) 798-2427 798-2407
OP & Info Svc	Sue Dobson	421 SW Oak, Room 7N7 Portland, OR 97204	(503) 242-4188 242-5423
PS	Debi Adams	421 SW Oak, Room 4S15 Portland, OR 97204	(503) 242-4617 242-8891
SBS & HPS (Mass Market)	Janet Brides	1801 California, Room 3130 Denver, CO 80202	(303) 896-0885 896-1320
VSC	Zane Allen	202 E. Earll Drive, Room 250 Phoenix, AZ 85018	(602) 235-8970 235-3333

6/15/94

Please notify Linda Williams with any changes/corrections
(206) 345 - 8477

U S WEST Communications
— CPNI Compliance Methods Managers

<u>MU</u>	<u>NAME</u>	<u>ADDRESS</u>	<u>TELEPHONE/FAX</u>
BGS/FED	Patricia Haupt	188 Inverness Dr. W., Room 600 Englewood, CO 80112	(303) 784-7963 784-7010
HPS	Judy Stom	1314 DOTM, 7th Floor Omaha, NE 68102	(402) 422-4488 422-7531
SBG	Debi Adams	421 SW Oak, Room 4S15 Portland, OR 97204	(503) 242-4617 242-8891
VSC	Zane Allen	202 E. Earll Dr., Room 250 Phoenix, AZ 85018	(602) 235-8970 235-3333

6/15/94

Please notify Linda Williams with any changes/corrections
(206) 345 - 8477

**U S WEST Communications, Inc.
Regional Policy and Procedures**

RPP 1005 - CUSTOMER PROPRIETARY NETWORK INFORMATION

Section 5. Access and Use Guidelines

5.01 OVERVIEW

Employees who plan, market, or sell enhanced/information services or CPE may not access CPNI-restricted customer accounts, nor use data from them. The FCC's rules require prohibiting "enhanced services/CPE" marketing employees access to CPNI-restricted customer records. The FCC's rules still allow us to market these unregulated products to restricted customers, but we must ensure we are not using a "restricted" customer's CPNI to initiate the marketing activity and that the person doing the marketing has no access to restricted CPNI. This section presents guidelines for access and use of customer record information by "enhanced services/CPE" marketing employees.

5.02 JOINT MARKETING ISSUES

Two points must be observed in the marketing of enhanced services or CPE:

- Employees who market or sell enhanced or CPE products/services must strictly follow the company guidelines about access and use of customer record information. These employees may only access customer records that are not CPNI-restricted.
- The opportunity for joint marketing (of enhanced services/CPE along with our network services) by USWC sales personnel includes the requirement that sales people avoid any chance of unhooking subscribers of competing enhanced services providers or CPE vendors. The unhooking issue is both a federal and state regulatory concern.

5.03 GUIDELINES

- CPNI from USWC customer records that is used for planning, marketing, or sales of enhanced services or CPE must always be drawn from unrestricted customer records. Information from the customer record that is not CPNI may be used regardless of the CPNI status of the customer record, e.g., customer segmentation is not CPNI. MCN FID, SIC code, information regarding enhanced services or CPE is not CPNI. Only when CPNI is used do the CPNI rules apply to the data's use. The data available to an "enhanced services" product or market manager for the enhanced service/CPE marketing activity will always reflect less information (e.g., potential # customers) and may somewhat impact sales forecasts and other analyses (e.g., fewer # customers on which to base a forecast).

5.04 'CPNI' STAMP REPORTS FOR MARKETING EMPLOYEES

Reports From Unrestricted Customer Records

Reports created from unrestricted customer record information (CPNI) should be stamped to identify they are produced from only unrestricted CPNI. The following stamp should be used:

This document was developed from
"unrestricted" customer records
("unrestricted CPNI").
Dated: _____

Reports From all Customer Records/Inclusive of Restricted Customer Records

Reports that are produced from restricted and unrestricted customer record information should be stamped to identify they contain restricted CPNI and therefore may not be used by employees involved in enhanced services or CPE planning, marketing, or sales activities. The following stamp should be used:

This report contains "restricted" customer record
information (CPNI). It may not be shared with
employees involved in enhanced services or CPE
planning, marketing or sales activities.
Dated: _____

Lists for Telemarketing/Direct Mail Purposes:

Lists for telemarketing programs for enhanced/information services or CPE products must be stripped of non-published and unlisted customers, in addition to "CPNI-restricted" customers. Remember to apply Oregon rules regarding telemarketing/direct mail (see note in Section 5.03).

NOTE

Such lists may be used for 3 months/90 days (these lists have a "life" of 3 months/90 days). If more time is required, the list must be re-run to ensure customers who have changed their CPNI status are removed from the document.

TABLE 2
CPNI IN REPORTS (page 1 of 6)

REPORT/DATA EXTRACT	GUIDELINES/SUGGESTIONS
<p>LISTS:</p> <p>Customer lists for enhanced services or CPE telemarketing or direct mail programs.*</p> <p align="center">NOTE</p> <p>Oregon ONA order prohibits use of CPNI to create lists for enhanced services telemarketing or direct mail unless we have customer authorization to use their CPNI <u>for that purpose</u>.</p> <p>* Lists obtained from external sources for use in ES/CPE marketing do not require removal of CPNI restricted customers/ information because by definition, these lists do not contain CPNI. CPNI is network service information derived from the regulated company customer records. It is advisable to document the source of such lists, in case questions or complaints arise from a telemarketing or direct mail activity.</p>	<p>Lists based on CPNI for telemarketing programs for enhanced services/CPE must be stripped of non-published and unlisted customers, in addition to "CPNI-restricted" customers, and those with "OCLS*" or "OATD*" (Colorado) or "NSOL*" (Oregon) option on their records. We may include non-published, unlisted, "NSOL*" customers in direct mail campaigns. (* residence only)</p> <p>Such lists may be used for 3 months/90 days. If more time is required, the list must be re-run to ensure customers who have changed their CPNI status are removed from the document.</p> <p>These reports should be marked with the date of development/printing, and a date of "expiration":</p> <p>This list was produced on _____ and its use in enhanced services or CPE marketing/sales is limited to 90 days from this date.</p>
<p>Customer lists created/sorted by CPNI - e.g., identifying customers who subscribe to specific USWC services. (Requested for enhanced services/CPE marketing purposes.)</p>	<p>Such lists must exclude "CPNI-restricted" customers when developed for "enhanced services/CPE" marketing employees. (See box above if list is for unsolicited marketing purposes).</p> <p>Call Forwarded-To numbers or other CPNI that <u>identifies end users of other enhanced service providers</u> may not be used for enhanced services, planning, marketing, or sales activity.</p>
<p>Creation of a list, using the MCN FID* on the customer service record, of U S WEST customers who subscribe to our enhanced services or CPE products.</p> <p>* MCN FID is the field identifier which notes which market unit USWC has assigned the account, whether the customer subscribes to/purchased USW enhanced service or CPE, and in the case of SBG, how the market unit has further segmented/defined the customer.</p>	<p>The <u>MCN FID</u> with its market unit and customer segment codes <u>is not CPNI</u>. If you want to create a list or report of customers based on the MCN FID (to pull customers by market segment), or all those who subscribe to USW enhanced services or CPE, you may pull this list by MCN FID.</p> <p>(See 5.03 for segmentation explanation)</p> <p>If the list is for telemarketing/direct mail purposes, those rules will also apply to this list.</p>